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BEFORE THE TENNESSEE REGULATORY AUTHORITY

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IN THE MATTER OF THE APPLICATION
OF CAT COMMUNICATIONS INTERNATIONAL, INC.
FOR A CERTIFICATE TO PROVIDE COMPETING
LOCAL TELECOMMUNICATIONS SERVICES

DOCKET NO.

02-01218

APPLICATION FOR CERTIFICATE TO PROVIDE
COMPETING LOCAL TELECOMMUNICATIONS SERVICES

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OF CAT COMMUNICATIONS INTERNATIONAL, INC.
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LOCAL TELECOMMUNICATIONS SERVICES**

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**APPLICATION FOR CERTIFICATE TO PROVIDE
COMPETING LOCAL TELECOMMUNICATIONS SERVICES**

Pursuant to applicable Tennessee Statutes and the Rules and Regulations of the Tennessee Regulatory Authority and Section 253 of the Federal Telecommunications Act of 1996 ("Act"), CAT Communications International, Inc. ("CCI") respectfully requests that the Tennessee Regulatory Authority ("TRA") grant to CCI authority to provide competing local telecommunications services, including exchange access telecommunications services, within the State of Tennessee. CCI is willing and able to comply with all applicable rules and regulations in Tennessee pertaining to the provision of competing local telecommunications services. TCA 65-4-201

In support of its Application, CCI submits the following:

1. The full name and address of the Applicant is:

CAT Communications International, Inc.
4142 Melrose Ave, NW
Roanoke, VA 24017-0129
Telephone: 540-265-2555

Questions regarding this application should be directed to:

Debra A. Waller
Regulatory Assistant
P.O. Box 6129
Roanoke, VA 24017-0129
Telephone: 540-444-2146
Facsimile: 540-444-2133

2. Attached, as **Exhibit 1** is CAT Communications Organizational Chart. There are no pending or anticipated mergers or acquisitions.

An Overview of CCI's corporate structure:

Regulatory

CCI is currently licensed to operate in 32 districts/states and is currently providing telecommunications service in 24 of those areas, including Tennessee. CCI has begun provisioning UNE-P service in Michigan. ILECS that CCI currently has or is negotiating interconnection agreements with include Verizon, Bell South, Sprint, Alltel, CenturyTel, Ameritech, Southwestern Bell, Pacific Bell, Cincinnati Bell and Concord Tel Co. CCI has started negotiations with Qwest enabling CCI to provide service in the Midwest and Western states.

Operations

CCI brings to the industry two decades of credit and marketing management to the credit challenged customer. This allows CCI to reduce its customer attrition rate to very acceptable levels compatible with continued growth. With its own proprietary software and MIS Department CCI is able to quickly and efficiently adjust to the needs of management and customers. CCI employs in-house programmers who maintain, update and create new databases. CCI operates through its RBOC supplier its own EDI provisioning facility reducing operating costs and delays. CCI also uses a state-of-the-art ACD telephone that allows programmed dialing to CCI's customer base to remind them of possible missed billing dates. CCI's own accounts receivable department processes customer payments. Its bill-processing center generates and mails the bills as well as promotion notices, no call letters, and disconnection information. With the addition of UNE-P service CCI will be able to service the customer's needs and desires more efficiently and with a greater savings to the customer.

Customer Service

CCI has been able to provide its customers enhanced services such as prepaid long distance, voicemail, and vertical services. With the ability to provision service with UNE-P CCI will be able to continue to provide these desired services and at a greater savings to the customer.

With its in-house technology and expertise, CCI is bringing cost-efficient high-demand telecommunications services to its customer base.

CCI employees a multilingual staff to aid customers who have difficulty communicating in English.

CCI has a department devoted to one on one personal customer care when needed. All customer service representatives are cross-trained so representatives can be used where needed during high call volume.

Corporate Management

CCI has an experienced Accounting Department with over sixteen years of corporate accounting management experience. They are well trained in the special needs of telecommunications taxes and reporting.

A fully developed Human Resources team is also in place to handle the increases in employment needs. We have an experienced interviewer who screens and tests applicants to insure that they have the skills necessary to work in this demanding and customer driven field. A fulltime trainer then takes these new employees and provides them a unique training experience. Using role-play, computer generated training programs and hands-on experience the employee is prepared to meet the needs of the customer.

CCI's own in-house advertising and marketing agency provides imaginative as well as informative brochures, posters, television and radio advertising campaigns for our product. Having an in-house team such as this keeps the costs for such needs down, allowing for a greater savings for the customer.

3. CCI was incorporated in Virginia November 3, 1997 our Articles of Incorporation and a current Certificate of Good Standing from Virginia are attached as **Exhibit 2**. A copy of CCI Authority to Transact Business in the State of Tennessee is attached as **Exhibit 3**.

Corporate History/Corporate Profiles of CCI

CAT Communications International, Inc. (CCI) has been providing basic local residential telecommunications service since the fall of 1997 to a client base consisting of predominately credit challenged individuals. With the implementation of UNE-P CCI, hopes to provide a more valuable service to that customer and attract more mainstream customers as well.

CCI has a history of service to its community, providing funding or helping organizations to obtain grants. These grants varied from helping persons with disabilities to creating a low cost veterinary service for low-income families. CCI was named Roanoke City/Roanoke County Employer of the year in 2001.

President and CEO

Norman D. Mason is the President and CEO of CCI. Mr. Mason is the Chairman elect of NALA. He has eighteen plus years of experience in the lease-to-own business, maintaining thirty-two such stores in six states. This experience prepared him for the complex challenges of running a customer

service driven telecommunications business. While the CCI remains headquartered in Virginia service is provided in many different states/districts. Mr. Mason's dedication to quality customer service has resulted in a well-trained staff using high quality technology to interface between CCI's customer base and the various companies whose services have been resold. After researching the pros and cons of UNE-P, service Mr. Mason felt it was in the best interest of the customer and company growth to expand into this area.

Vice-President, Regulatory

Patricia Sheets came to CCI from Network Solutions, a company involved in the outbound marketing of Bell Atlantic services. The sales plans and business strategies she developed help make them the top seller of Centrex service for three years. She also helped design an outbound call center for them in the Roanoke area. This call center grew from handling 1 to 320 businesses in one year. Since coming to CCI, Ms. Sheets has watched the business grow from 8 to over two hundred employees. She has been instrumental in the growth of CCI overseeing the regulatory operations. Ms. Sheets' extensive customer service background enables her to effectively deal with ILECS and commissions in resolving problems effectively. She is responsible for overseeing the application, tariffing and compliance within each state. She has a well-trained staff that interfaces with the regulatory commissions and ILEC'S OSS departments. These individuals assure that orders flow through all the different support systems efficiently and customer's needs are met promptly and in compliance with the various rules and regulations.

Vice-President, Call Center Operations

Steve Fralin is the Vice President of Operations at CCI. Mr. Fralin is a graduate of Ferrum College with a BA in Business management and Finance has over ten years experience in networking/telephony and the rent to own industry. His experience in these areas has helped Mr. Fralin develop a highly skilled management team that is able to handle the increasing demands of the telecommunications industry. He oversees all operations at CCI insuring an appealing product and that CCI remains competitive.

General Manager

Jennifer W. Lowman manages the day-to-day operations of the call center. She is a graduate of North Carolina State University with a BA in Communications. Ms. Lowman is also a member of Who's Who of Professional Management. Ms. Lowman has an efficient staff of managers that report directly to her. She insures that employees receive adequate training and monitors performance to find areas where additional training may be needed. She oversees the updates of materials necessary for sales and the processing of orders. Ms. Lowman keeps her staff updated on any change of rules and regulations enabling the customer service representatives to provide quality service to the CCI customer.

Regulatory Assistant

Debra Waller deals directly with state regulatory agencies. Ms. Waller is a graduate of the University of South Carolina and has a paralegal degree. Her previous legal experience is utilized to maintain compliance with state rules and regulations. Ms. Waller files state mandated reports, updates tariffs and tariffs promotions. She also addresses the formal complaints filed by customers.

Accounting

Sandra Houseman heads CCI's accounting department. Ms. Houseman has a BA in Accounting from James Madison University. She has over 16 years of financial and managerial experience. She oversees a staff well trained in telecommunications reporting and taxes.

Information Technology Manager

Steve Wilhelm has an Applied Science, Management Informations Systems degree and is responsible for providing essential systems solutions for CCI's data and information needs. Mr. Wilhelm and his staff design and develop applications unique to this industry to enable customer account tracking, provisioning interfaces with ILECs and external payment centers as well as bill reconciliation of customer accounts and ILEC accounts. The goal of his department is to complement the efforts of the operational staff by streamlining and automating day-to-day tasks. Mr. Wilhelm provides guidance and direction so CCI can stay on the leading edge of telecommunications systems technology.

Systems Administrator

Matt Campbell, MCP is in charge of CCI's Networking/Computer Systems department. Mr. Campbell has over 8 years of experience with PCs and over 3 years of experience in networking/systems integration. His specialties are Microsoft and RedHat Linux operating systems. Mr. Campbell ensures the day-to-day functionality of CCI's network and computer related systems.

Telephony Systems Administrator

H.C. Burke has 7 years of experience with telephony systems. Mr. Burke has installed and maintained Panasonic line sharing systems at CCI and many other business locations, for Prime Time Rentals. Recently, Mr. Burke received certification for the NEC NEAX 2400 IMX PBX. His primary duty at CCI is to maintain and upgrade the call center telephone system.

4. As the preceding answers and the financial statements attached as **Exhibit 4** will attest CCI has the financial, technical and managerial ability to provide the requested telecommunications service.

A. Financial Qualifications

See **Exhibit 4.**

B. Managerial Qualifications

CCI's managerial qualifications are outlined in the answer to question #3.

C. Technical Qualifications

At the current time, CCI will continue to use the technical staff of the incumbent LEC to install and repair the proposed service. Therefore, CCI's installation and repair will be as technically capable as the incumbent LEC.

CCI maintains a state of the art call center to service the customer. We have adequate staff to operate the center and staff is trained to provide quality customer service. Callers are able to talk to a live operator and receive prompt professional answers to their questions.

CCI will provide the necessary tariffs in compliance with TRA rules and regulations and will provide service within these guidelines.

5. Proposed Service Area

CCI already has resale authority throughout the state of Tennessee and desires to amend that authority to include limited facilities based throughout Tennessee.

Initially CCI will provide limited facilities based service via UNE-P and will gradually transfer its customer base from resale to UNE-P

Additionally CCI provides resale in Alabama, Arkansas, California, Delaware, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maryland, Missouri, New Jersey, New York, North Carolina, Ohio, Pennsylvania, South Carolina, Virginia and Washington, DC. CCI provides resale and UNE-P in Michigan. CCI has limited facilities based authority in Colorado, Connecticut, Massachusetts and Nevada and will begin servicing those areas after the first of the year.

6. CCI's customer base has primarily been the credit challenged customer. While CCI intends to continue serving this type of customer with the use of UNE-P CCI believes its prices will be competitive enough to attract the credit worthy customer also.

By provisioning service with UNE-P CCI will be able to offer vertical services such as caller ID, call waiting or three way calling in conjunction with the price of its basic monthly service. Operator and directory as well as 911 services will still be provided by agreement with the incumbent LEC. CCI currently resells Lifeline service and will continue to provide that service, when requested, via resale.

7. CCI is dedicated to quality customer service. To facilitate quality customer service CCI operates a state of the art call center. Our customer service representatives are well trained to handle various types of customer issues. CCI believes a customer should be able to call in and speak with a live representative and works diligently to keep waiting time, if any, for the customer to a minimum.

CCI provides a toll free number, 1-888-477-1224, for the customer's convenience. The company may be contacted at the corporate office, P.O. Box 6126, Roanoke, VA 24017-0129, or the customer can access us through the web at www.ccitelecom.com. This information is printed on the monthly bills the customer receives for added convenience.

For additional information Debra Waller, whose address and contact numbers are provided in (1) above, can be contacted.

8. Small and Minority-Owned Telecommunications Business Participation Plan:

Pursuant to T.C.A. §65-5-212, as amended, CCI submits this participation in the small and minority owned telecommunications business participation plan ("Plan") along with its application for an Amended Certificate of Public Convenience and Necessity to provide limited facilities based service throughout the state of Tennessee.

I. Purpose

The purpose of §65-5-212 is to provide opportunities for small and minority owned business to provide goods and services to telecommunications service providers. CCI, as a small privately owned business, appreciates and is committed to the goals of §65-5-212 and is supportive of businesses of this nature. When possible CCI will endeavor to provide opportunities for such businesses to

compete for contracts and subcontracts for goods and services and will make an effort to identify such businesses that are capable of providing goods or services to CCI. CCI's representative has contacted the Department of Economic and Community Development to obtain a list of qualified vendors.

II. Definitions

As defined in §65-5-212 a *Minority Owned Business* is either solely owned or at least 51% of the outstanding stock is owned by an individual who personally manages and controls daily operations and is impeded from normal entry into business because of race, religion, sex or national origin and the business has a gross annual income of less than \$4,000,000.00.

A *small business* is a business with a gross annual income of less than \$4,000,000.00.

III. Administration

CCI's Plan will be overseen and administered by the individual names below hereinafter referred to as Administrator:

Debra A. Waller
CAT Communications International, Inc.
P.O. Box 6129
Roanoke, VA 24017-0129
Telephone: 540-444-2146
Fax: 540-444-2133
Email: dwaller@ccitelecom.com

The Administrator's responsibilities will include:

- a. Maintaining an updated Plan in full compliance with §165-5-212 and the rules and orders of the Tennessee Regulatory Authority ("TRA).
- b. Establishing and developing policies and procedures necessary for the successful implementation of the Plan.
- c. Preparing and submitting any forms required by the TRA, including the filing of annual updates.

- d. Serve as the primary liaison with TRA and other state agencies and small and minority owned businesses as defined in §165-5-212.
- e. Searching for and developing opportunities to use small businesses and encouraging such businesses to participate in bidding.
- f. Providing records and reports and cooperating with any authorized surveys as required by the TRA.
- g. Establish a record keeping system to track-qualified small and minority owned businesses and efforts to use such businesses.
- h. Provide information and educational activities to persons in CCI and training such persons to seek out, encourage and promote the use of such businesses

In performance of these duties, the Administrator will utilize a number of resources, including:

Chambers of commerce
The Tennessee Department of Economic and
Community Development
The United States Department of Commerce
Small Business Administration
Office of Minority Business
The National Minority Supplier Development
Counsel
The National Association of Women Business
Owners
Historically Black Colleges, Universities and
Minority Institutions

The efforts to promote and ensure equality for small and minority owned business are spelled out in the Administrator's duties. Additional efforts to provide opportunities and appropriate and feasible assistance.

IV. Records and Compliance Reports

CCI will maintain records of qualified small and minority owned businesses and efforts to use such businesses. In addition, CCI will maintain records of any training activities conducted or attended and of internal procurement procedures adopted to support this plan.

CCI will submit records and reports required by TRA concerning the Plan. Moreover, CCI will cooperate fully with any surveys and studies by the TRA.

9. Toll Dialing Parity Plan:

At this time, CCI places blocks on all of its accounts that block access to all toll calling abilities. Customers wishing to make this type of call will need to purchase some form of prepaid long distance, i.e.: calling cards from the provider of their choice.

While no definite date is planned for the implementation, CCI hopes to attract credit worthy customers with its UNE-P service. Once this begins to happen customers will be able to pick to a long distance carrier of their choice. Toll dialing parity will be provided in all exchanges at that time. CCI will continue to PIC the customer to none and none blocking toll access until the customer calls in requesting long distance service be attached. CCI will require a three-way call with the long distance provider to verify the PIC is valid. CCI will also require that the long distance provider bill the customer directly. CCI has no plans for directly providing long distance service and therefore the customer will be required to pick a carrier other than CCI. CCI will allow the customer to pick carriers of their choice for intralata and interlata toll dialing. Customers will be informed of the procedures for establishing long distance when they order CCI service. They will also be told that such calls will be blocked until a decision is made on the carrier. The customer will have up to six months to choose their long distance carrier without incurring a PIC change charge. After the initial PIC, changes will incur a charge. Because CCI requires a three-way call with the proposed IXC and because CCI will be assured of the IXC billing independently there should be little opportunity for slamming. Once this plan is implemented, CCI will conduct it according to rules and regulations laid down by the FCC and the TRA.

10. Applicant has served notice of this application to the eighteen (18) incumbent local exchange telephone companies in Tennessee with a statement regarding the company's intention of operating geographically. See **Exhibit 5** for the list.

11. Numbering Issues:

CCI intends to provide service via UNE-P at this time. Since we will provide service in this manner, we will be ordering numbers from the incumbent LEC as needed.

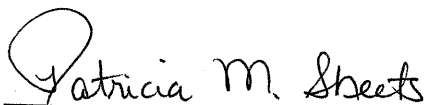
12. Tennessee Specific Operational Issues:

- A. Sworn Pre-filed testimony is attached as **Exhibit 6.**
- B. Applicant does not require customer deposits.
- C. CCI has had very few customer complaints regarding the resale service provided in Tennessee. The complaints we have had have been related to previous carriers not releasing lines thereby delaying connection of CCI service.
- D. A copy of our proposed tariff is attached. This tariff will cover the proposed UNE-P service as well as existing resale service.

CONCLUSION

CCI respectfully requests that the TRA enter an order granting the amending of CCI's current certificate. Granting this certificate is in the best interest of the public in that it will encourage competition, provide high quality service to the consumer and encourage development and improvement for all competing providers.

Respectfully submitted the 7th day of November, 2002



Patricia M. Sheets, Vice President
CAT Communications International, Inc.

EXHIBIT 1

ORGANIZATIONAL CHART

CAT Communications Organizational Chart

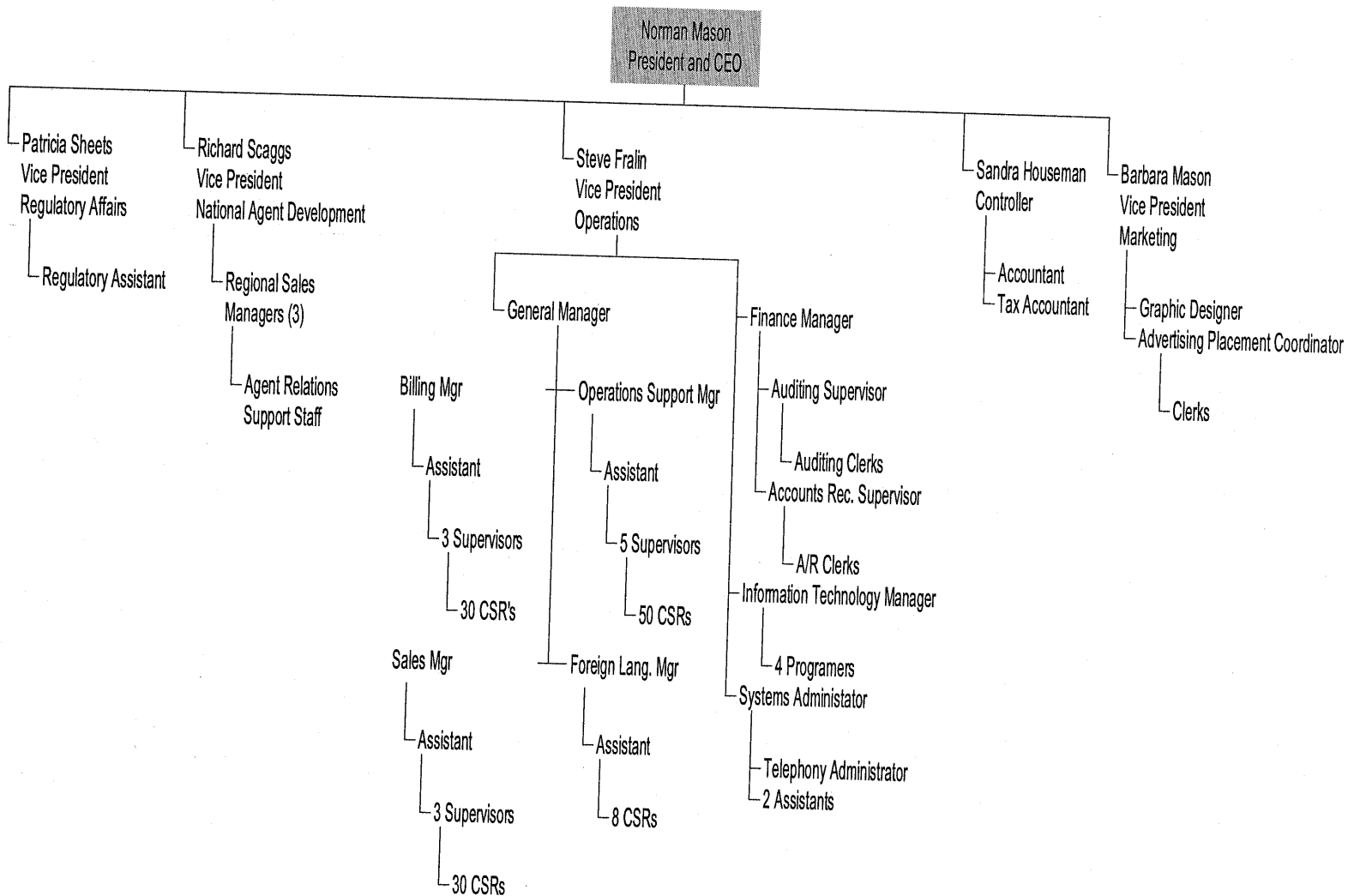


EXHIBIT 2

ARTICLES OF INCOPROATION & VIRGINIA CERTIFICATE OF GOOD STANDING

Commonwealth of Virginia



State Corporation Commission

I Certify the Following from the Records of the Commission:

CAT COMMUNICATIONS INTERNATIONAL, INC. is a corporation existing under and by virtue of the laws of Virginia, and is in good standing.

The date of incorporation is November 03, 1997.

Nothing more is hereby certified.



*Signed and Sealed at Richmond on this Date:
August 15, 2002*

Joel H. Peck

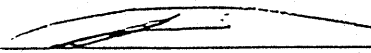
Joel H. Peck, Clerk of the Commission

ARTICLES OF INCORPORATION
OF
CAT COMMUNICATIONS INTERNATIONAL, INC.

We, the undersigned, hereby associate to form a stock corporation under the provisions of Chapter 9 of Title 13.1 of the Code of Virginia, 1950, as amended to date, and to that end we do by this, our Articles of Incorporation, set forth the following information:

- A. The name of this corporation is to be CAT COMMUNICATIONS INTERNATIONAL, INC.
- B. The authorized number of shares which the corporation shall have authority to issue and the par value per share are as follows: class - common, number of shares - 2,000, par value - \$1.00.
- C. Post Office address of the initial registered office of the corporation is Bramblewood Park, 2721 Brambleton Avenue, S. W., P. O. Box 21681, City of Roanoke, Virginia 24018.
- D. The name of the initial registered agent of this corporation is Tommy Joe Williams, who is a resident of the State of Virginia and a member of the Virginia State Bar and whose business office is the same as the registered office of the corporation.
- E. The number of directors constituting the initial Board of Directors are four (4) and their names and addresses are: Norman D. Mason, P. O. Box 539, Cloverdale, Virginia, 24077; Barbara S. Mason, P. O. Box 539, Cloverdale, Virginia, 24077; Chris Sedone, P. O. Box 539, Cloverdale, Virginia, 24077; and Howard Swartz, P. O. Box 539, Cloverdale, Virginia, 24077.
- F. The period of time for which this corporation shall endure shall be unlimited.
- G. The Shareholders shall have no preemptive rights.

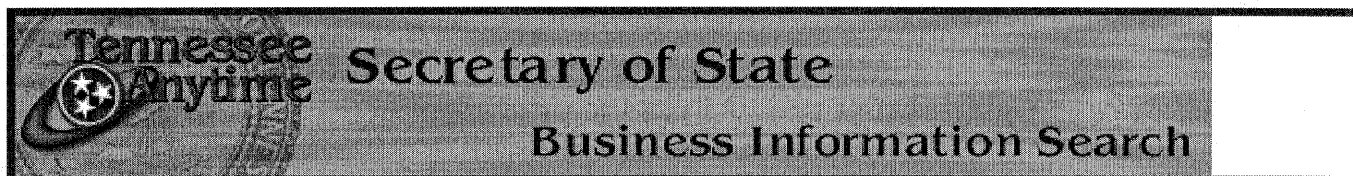
GIVEN under my hand this 5/ day of October, 1997.



Tommy Joe Williams, Incorporator

EXHIBIT 3

TENNESSEE CERTIFICATE OF AUTHORIZATION

[Secretary of State
Office](#)[TennesseeAnytime
Registration Form](#)[Instructions](#)[Feedback Form](#)**Name****I.D. Number**CAT COMMUNICATIONS
INTERNATIONAL, INC.

0372248

Business Type*: CORPORATION
Profit/Nonprofit: FOR PROFIT
Status*: ACTIVE
Date of Formation/Qualification: 06/09/1999
Domestic/Foreign: FOREIGN
Place of Incorporation/Organization: VA
Duration: PERPETUAL
FYC(Fiscal Year Closing) Month: DECEMBER

Principal Office:

Address Line 1: 4142 MELROSE AVENUE
Address Line 2: UNIT #25
City: ROANOKE
State: VA
Zip: 24017

Other than USA:**Registered Agent:**

Name: NATIONAL REGISTEREDAGENTS, INC.
Address Line 1: 1900 CHURCH STREET
Address Line 2: SUITE 400
City: NASHVILLE
State: TN
Zip: 37203

Business Filing History

* Important Note: Business filing History includes information about (1) the basis for an inactive status and (2) the current true name and filing status of a business with an assumed name or a changed status.

Note: This information is current as of three working days prior to today's date.

[Do Another Search](#)

EXHIBIT 4

FINANCIALS

FILED UNDER SEAL

EXHIBIT 5
SERVICE LIST

**SERVICE LISTING
FACILITIES BASED INCUMBENT
LOCAL EXCHANGE SERVICE PROVIDERS
CERTIFICATED IN TENNESSEE**

- 1) **ARDMORE TELEPHONE COMPANY, INC.**
P.O. Box 549
517 Ardmore Avenue
Ardmore, TN 38449
(205) 423-2131
(205) 423-2208 (Fax)
- 2) **BELLSOUTH**
333 Commerce Street
Nashville, TN 37201-3300
(615) 214-3800
(615) 214-8820 (Fax)
- 3) **CENTURY TELEPHONE OF ADAMSVILLE**
P.O. Box 405
116 N. Oak Street
Adamsville, TN 38310
(901) 632-3311
(901) 632-0232 (Fax)
- 4) **CENTURY TELEPHONE OF CLAIBORNE**
P.O. Box 100
507 Main Street
New Tazewell, TN 37825
(423) 626-4242
(423) 626-5224 (Fax)
- 5) **CENTURY TELEPHONE OF OOLTEWAH-COLLEGEDALE, INC.**
P.O. Box 782
5616 Main Street
Ooltewah, TN 37363
(423) 238-4102
(423) 238-5699 (Fax)

**SERVICE LISTING
FACILITIES BASED INCUMBENT
LOCAL EXCHANGE SERVICE PROVIDERS
CERTIFICATED IN TENNESSEE**

- 6) **CITIZENS COMMUNICATIONS COMPANY OF TENNESSEE**
P.O. Box 770
300 Bland Street
Bluefield, WV 24701

- 7) **CITIZENS COMMUNICATIONS COMPANY OF THE VOLUNTEER STATE**
P.O. Box 770
300 Bland Street
Bluefield, WV 24701

- 8) **LORETTO TELEPHONE COMPANY, INC.**
P.O. Box 130
Loretto, TN 38469
(931) 853-4351
(931) 853-4329 (Fax)

- 9) **MILLINGTON TELEPHONE COMPANY, INC.**
P.O. Box 429
4880 Navy Road
Millington, TN 38083-0429
(901) 872-3311
(901) 873-0022 (Fax)

- 10) **SPRINT-UNITED**
112 Sixth Street
Bristol, TN 37620
(423) 968-8161
(423) 968-3148 (Fax)

- 11) **TDS TELECOM-CONCORD TELEPHONE EXCHANGE, INC.**
P.O. Box 22610
701 Concord Road
Knoxville, TN 37933-0610
(423) 966-5828
(423) 966-9000 (Fax)

- 12) **TDS TELECOM-HUMPHREYS COUNTY TELEPHONE COMPANY**
P.O. Box 552
203 Long Street
New Johnsonville, TN 37134-0552
(931) 535-2200
(931) 535-3309 (Fax)

**SERVICE LISTING
FACILITIES BASED INCUMBENT
LOCAL EXCHANGE SERVICE PROVIDERS
CERTIFICATED IN TENNESSEE**

- 13) TDS TELECOM-TELLICO TELEPHONE COMPANY, INC.**
P.O. Box 9
102 Spence Street
Tellico Plains, TN 37385-0009
(423) 671-4600
(423) 253-7080 (Fax)
- 14) TDS TELECOM-TENNESSEE TELEPHONE COMPANY**
P.O. Box 18139
Knoxville, TN 37928-2139
(423) 922-3535
(423) 922-9515 (Fax)
- 15) TEC-CROCKETT TELEPHONE COMPANY, INC.**
P.O. Box 7
Friendship, TN 38034
(901) 677-8181
- 16) TEC-PEOPLE'S TELEPHONE COMPANY, INC.**
P.O. Box 310
Erin, TN 37061
(931) 289-4221
(931) 289-4220 (Fax)
- 17) TEC-WEST TENNESSEE TELEPHONE COMPANY, INC.**
P.O. Box 10
244 E. Main Street
Bradford, TN 38316
(901) 742-2211
(901) 742-2212 (Fax)
- 18) UNITED TELEPHONE COMPANY**
P.O. Box 38
120 Taylor Street
Chapel Hill, TN 37034
(931) 364-2289
(931) 364-7202 (Fax)

EXHIBIT 6

SWORN PRE-FILED TESTIMONY

BEFORE THE TENNESSEE REGULATORY AUTHORITY

**IN THE MATTER OF THE APPLICATION
OF CAT COMMUNICATIONS INTERNATIONAL, INC.
FOR A CERTIFICATE TO PROVIDE COMPETING
LOCAL TELECOMMUNICATIONS SERVICES**

PRE-FILED TESTIMONY OF DEBRA A. WALLER

I Debra A. Waller, do hereby testify as follows in support of the application of CAT Communications International, Inc. (CCI) for an Amended Certificate of Convenience and Necessity as a competing telecommunication service provider to provide telecommunications service via UNE-P throughout the State of Tennessee.

Q. Please state your full name, business address and position.

A. My name is Debra A. Waller, I work at the principal business office of CAT Communications located at 4142 Melrose Avenue, NW, Roanoke, VA 24017, and I am the Regulatory Assistant and work directly for the Vice President of Regulatory Affairs.

Q. Please briefly describe your duties.

A. I work on the necessary certification to transact business in a State and with the Commission. I draft tariffs, update or prepare promotional tariffs as needed. I familiarize myself with the rules and regulations of the state and pass the information on to the individuals who need to know. I file regulatory reports with the various commissions, working with the accounting department when necessary to prepare the report. I deal directly with the Commission to resolve any issues, including customer complaints. If there is a pattern to the customer complaints, I work with the appropriate individuals to alleviate the cause of the complaints. In Tennessee, I will be the Administrator of our Small and Minority-Owned Business Plan.

Q. Please describe your business experience and educational background.

A. I have a BS in Business Administration from the University of South Carolina and a degree in Legal Administration from Virginia Western. I worked for a bank in Pennsylvania for seven years five years as the

assistant to the vice president of Investments, two years as a loan officer. After that I returned to school for my paralegal degree and worked in Law Offices for eight years prior to coming to CCI in June of 2001.

Q. Are all the statements in CCI's application true and correct to the best of your knowledge, information and belief?

A. All the statements contained in the application are true to the best of my knowledge, information and belief.

Q. Please describe the current corporate structure of CCI.

A. This issue is more formally addressed in the organizational chart attached herein as Exhibit 1. However, I will state here that CCI has corporate management who deals directly with middle management assuring that state requirements are understood and programs instituted to follow those requirement. Middle management deals with an additional two tiers of management personnel so that our supervisory staff has approximately ten customer service representatives each there by assuring prompt and professional attention to all customer needs.

Q. Does CCI possess the requisite managerial, financial, and technical abilities to provide the services for which it has applied? Please describe.

A. CCI has been a successful reseller since 1998. In that time, CCI has managed its growth with attention to detail, customer service and financial profitability. CCI has decided to pursue the UNE market after careful research and planning to determine the process is viable, would be advantageous to our customer, and contribute to continued growth for the company within the field and financially. Our staff has attended classes at the various ILECs to make sure the process is understood. The information gathered in these classes has been compiled and disseminated to the appropriate staff to educate them on the new process. Auditing and accounting have been "beefed up" to prepare for the more complex billing. New systems technology has been created to effectively implement the process and aid in its smooth implementation. Financially CCI has prepared to meet the new challenge by doing a cost analysis of the service and projecting the savings of the company and the customer. CCI has also researched the matter and determined that UNE-P service would allow it to be competitive with a different type of customer.

Q. What services will CCI offer?

A. CCI will offer basic local service. Under UNE-P CCI will be able to provide "packages" these will include dial tone plus vertical features. In addition,

as the market expands CCI plans to allow customers to attach long distance as long as the company bills the customer directly.

Q. Will CCI offer service to all consumers within its service area?

A. CCI has historically attracted the credit challenged customer and we plan to continue to service this customer. However, with the implementation of UNE-P CCI anticipates attracting the credit worthy customer with competitively priced packages. Therefore, we plan to service all consumers who desire to use our service.

Q. Does CCI plan to offer local exchange telecommunications services in areas served by any incumbent local exchange telephone company with fewer than 100,000 total access lines?

A. CCI has resale and/or interconnection agreements with Bell South, Sprint and CenturyTel in Tennessee at this time. While we have not dealt with any smaller companies in Tennessee, we have done so in other areas. If we should find our product is appealing in areas serviced by smaller companies, we will contact them and attempt to negotiate a suitable agreement.

Q. Will granting a certificate of convenience and necessity be in the public interest?

A. CCI has been providing service in Tennessee via resale and currently has over 2000 customers within the state. UNE-P service is by its nature more competitive and thereby less costly for the customer than resale. Granting our request would result in a better product for less money for current customers. In addition, the "packages" CCI would offer will attract a larger customer base providing them with more service for less.

Q. Does CCI intend to comply with all TRA rules, statutes, and orders pertaining to the provision of telecommunications services in Tennessee, including disconnection and reconnection of service?

A. CCI is already in compliance with these rules, etc. as a reseller. CCI's almost nonexistent complaint record should attest to its compliance. There would be no reason to change our course in the future.

Q. Has any state ever denied or revoked CCI or one of its affiliates?

A. CCI has never been denied or revoked in any area. If any irregularities have surfaced, CCI has worked closely with the state's regulatory agency to alleviate the problem and bring the company into compliance. CCI has no affiliates so that would not apply.

Q. Has CCI ever been investigated or sanctioned by any regulatory authority for service or billing irregularities?

A. No.

Q. Who is knowledgeable about CCI's operations and will serve as CCI's regulatory and customer service contact?

A. I will serve as this contact. Regulatory compliance and customer issues are a top priority for me. Such issues are handled promptly.

Q. Please explain CCI's procedures for responding to information requests from the TRA and its staff.

A. Any request from a regulatory agency, regardless if it is for additional information for reports or applications or a customer complaints, are given top priority. If it is in relation to a report or application the request will be taken and the information necessary to reply will be researched and the information returned as requested.

A customer complaint is usually answered the same day. I will try to isolate the problem and then take the information to the proper manager to be handled promptly. Once the matter is resolved, a written or oral report is made on the outcome.

Q. Does this conclude your testimony?

A. Yes it does.

I swear that the foregoing testimony is true and correct to the best of my knowledge and belief.

Debra A. Waller

Debra A. Waller
Regulatory Assistant
CAT Communications International, Inc.

Subscribed and sworn to me this 7 day of November, 2002

Tricia M. Tate

Notary Public
State of Virginia
City of Roanoke

7-31-2003

My commission expires

Certificate of Service

I, Patricia M. Sheets, certify that I have forwarded a copy of the foregoing Motion of CAT Communications International, Inc. for Leave to File Confidential Materials Under Seal; to all parties listed on the attached Service List at the addresses set forth, with postage fully prepaid, via U.S. Mail.

Executed this 7th day of November 2002, in Roanoke, Virginia.

A handwritten signature in cursive script, reading "Patricia M. Sheets", is written over a horizontal line.

Patricia M. Sheets
Vice President
CAT Communications International, Inc.
P.O. Box 6129
Roanoke, VA 24017

BEFORE THE TENNESSEE REGULATORY AUTHORITY

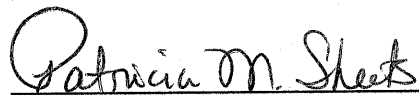
IN THE MATTER OF THE APPLICATION OF
CAT COMMUNICATIONS INTERNATIONAL, INC.
FOR A CERTIFICATE TO PROVIDE
COMPETING LOCAL
TELECOMMUNICATIONS SERVICES

Motion of CAT Communications International, Inc.
For Leave to File Confidential Materials Under Seal

CAT Communications International, Inc. (CCI) respectfully requests that the Commission enter an Order granting the confidentiality of CAT Communications International, Inc.

_____ attached as exhibits to Application of CAT Communications International, Inc. for a Certificate of Public Convenience And Necessity to Offer Limited Facilities Based Services. CCI is a privately held company. As such, its financial documents are not readily available to the public. Within CCI, its financial information is disbursed on a need to know basis. It is CCI's belief that such information provides a competitive edge. To make this information available to the public would allow CCI's competitors knowledge of CCI's finances that cannot be obtained any other way. Thereby damaging the competitive edge CCI feels it has through the confidentiality of this information.

Respectfully submitted,



Patricia M. Sheets
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CAT Communications International, Inc.
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Roanoke, VA 24017-0129
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Fax: 540-444-2133
Email: pspencer@ccitelecom.com

**SERVICE LISTING
FACILITIES BASED INCUMBENT
LOCAL EXCHANGE SERVICE PROVIDERS
CERTIFICATED IN TENNESSEE**

- 1) **ARDMORE TELEPHONE COMPANY, INC.**
P.O. Box 549
517 Ardmore Avenue
Ardmore, TN 38449
(205) 423-2131
(205) 423-2208 (Fax)
- 2) **BELLSOUTH**
333 Commerce Street
Nashville, TN 37201-3300
(615) 214-3800
(615) 214-8820 (Fax)
- 3) **CENTURY TELEPHONE OF ADAMSVILLE**
P.O. Box 405
116 N. Oak Street
Adamsville, TN 38310
(901) 632-3311
(901) 632-0232 (Fax)
- 4) **CENTURY TELEPHONE OF CLAIBORNE**
P.O. Box 100
507 Main Street
New Tazewell, TN 37825
(423) 626-4242
(423) 626-5224 (Fax)
- 5) **CENTURY TELEPHONE OF OOLTEWAH-COLLEGEDALE, INC.**
P.O. Box 782
5616 Main Street
Ooltewah, TN 37363
(423) 238-4102
(423) 238-5699 (Fax)

**SERVICE LISTING
FACILITIES BASED INCUMBENT
LOCAL EXCHANGE SERVICE PROVIDERS
CERTIFICATED IN TENNESSEE**

- 6) **CITIZENS COMMUNICATIONS COMPANY OF TENNESSEE**
P.O. Box 770
300 Bland Street
Bluefield, WV 24701

- 7) **CITIZENS COMMUNICATIONS COMPANY OF THE VOLUNTEER STATE**
P.O. Box 770
300 Bland Street
Bluefield, WV 24701

- 8) **LORETTO TELEPHONE COMPANY, INC.**
P.O. Box 130
Loretto, TN 38469
(931) 853-4351
(931) 853-4329 (Fax)

- 9) **MILLINGTON TELEPHONE COMPANY, INC.**
P.O. Box 429
4880 Navy Road
Millington, TN 38083-0429
(901) 872-3311
(901) 873-0022 (Fax)

- 10) **SPRINT-UNITED**
112 Sixth Street
Bristol, TN 37620
(423) 968-8161
(423) 968-3148 (Fax)

- 11) **TDS TELECOM-CONCORD TELEPHONE EXCHANGE, INC.**
P.O. Box 22610
701 Concord Road
Knoxville, TN 37933-0610
(423) 966-5828
(423) 966-9000 (Fax)

- 12) **TDS TELECOM-HUMPHREYS COUNTY TELEPHONE COMPANY**
P.O. Box 552
203 Long Street
New Johnsonville, TN 37134-0552
(931) 535-2200
(931) 535-3309 (Fax)

**SERVICE LISTING
FACILITIES BASED INCUMBENT
LOCAL EXCHANGE SERVICE PROVIDERS
CERTIFICATED IN TENNESSEE**

- 13) TDS TELECOM-TELLICO TELEPHONE COMPANY, INC.**
P.O. Box 9
102 Spence Street
Tellico Plains, TN 37385-0009
(423) 671-4600
(423) 253-7080 (Fax)
- 14) TDS TELECOM-TENNESSEE TELEPHONE COMPANY**
P.O. Box 18139
Knoxville, TN 37928-2139
(423) 922-3535
(423) 922-9515 (Fax)
- 15) TEC-CROCKETT TELEPHONE COMPANY, INC.**
P.O. Box 7
Friendship, TN 38034
(901) 677-8181
- 16) TEC-PEOPLE'S TELEPHONE COMPANY, INC.**
P.O. Box 310
Erin, TN 37061
(931) 289-4221
(931) 289-4220 (Fax)
- 17) TEC-WEST TENNESSEE TELEPHONE COMPANY, INC.**
P.O. Box 10
244 E. Main Street
Bradford, TN 38316
(901) 742-2211
(901) 742-2212 (Fax)
- 18) UNITED TELEPHONE COMPANY**
P.O. Box 38
120 Taylor Street
Chapel Hill, TN 37034
(931) 364-2289
(931) 364-7202 (Fax)